

The logo consists of the word "CleanTech" in a bold, sans-serif font, with "ENERGY" in a smaller, all-caps font below it. The text is white and is contained within a white circle. The background of the top half of the cover is a photograph of solar panels under a cloudy sky, with a large blue geometric shape overlaid on the left side.

CleanTech
ENERGY

CleanTech Energy Pty Ltd

Electricity Retail Licence
Application – Public

October 2019

The logo features the text "CleanTech" in a bold, sans-serif font, with "ENERGY" in a smaller, all-caps font below it. To the left of the text is a small icon of a map of Western Australia with "100% WA" written on it. To the right is a circular icon with a checkmark and the text "100% RENEWABLE ENERGY". The background of the bottom half of the cover is a light grey geometric shape.

CleanTech
ENERGY

Contents

Introduction.....	2
Required Information – General Particulars	2
Organisational and Technical Capacity Criterion	3
Financial Capacity Criterion	16
Suitability Criterion	17
List of Submission Documents	18

Introduction

CleanTech Energy Pty Ltd (**CleanTech**) is a privately owned Australian proprietary limited company who are currently an electricity retailer and generator (gentailer) operating on Western Australia's SWIS grid and have identified an opportunity to expand our operations to the eastern states and work directly with our customers to find ways of saving money through sustainable and innovative energy management strategies.

CleanTech has conducted extensive analysis on the eastern states' energy markets prior to the submission of our licence application, and we believe we have positioned ourselves to grow at a slow and steady pace with minimal risk. Our PPAs are set in such a way so that wholesale energy prices have minimal impact on our business operations as our pricing and profit are based on cost pass-through models. This mitigates risk to us and keeps the cost of energy low for our customers.

Therefore, CleanTech Energy Pty Ltd applies to the Australian Energy Regulator (AER) under section 89 of the National Energy Retail Law (NERL) for a retailer authorisation for electricity.

Required Information – General Particulars

1. Your legal name

The applicant's legal name is CleanTech Energy Pty Ltd

2. Your trading name if different to your legal name

The applicant's trading name is the same as above.

Please see Appendix A for a copy of CleanTech's Business Registration Certificate.

3. ABN

ACN: 603 595 704

ABN: 26 603 595 704

4. A registered business address and address for correspondence

Registered business address:

Ground Floor,
1205 Hay Street
West Perth WA 6005

Address for correspondence:

PO Box 262, West Perth WA 6872

5. A nominated contact person, including their position in the organisation and contact details

Name: Chris Wallace
Position: General Manager, CleanTech Energy
Address: Ground Floor, 1205 Hay St, West Perth WA 6005
Phone: 08 6147 7555
Email: chris.wallace@cleantechenergy.com.au

6. The form of energy which a retailer authorisation is sought
CleanTech is seeking a retailer authorisation for electricity.

7. The date you intend to commence retailing energy
CleanTech intends to commence retailing electricity in the jurisdictions mentioned below in July 2020.

8. The nature and scope of the operations proposed
The sale of electricity to small customers, small market offer customers and large customers.

9. The jurisdictions in which you intend to retail energy.
CleanTech intends to retail electricity in South Australia, New South Wales (including the Australian Capital Territory), Tasmania and Queensland (**Jurisdictions**).

10. The type of customers you intend to supply
CleanTech intends to supply small customers, small market offer customers and large customers, each as defined in section 5 of the NERL, and subject to applicable consumption thresholds under jurisdictional energy legislation.

More information is included in Appendix B – Business Plan

Organisational and Technical Capacity Criterion

1. Details of your previous experience as an energy retailer:
CleanTech Energy are a registered market participant and electricity retailer in Western Australia who hold an electricity retail licence, ERL24, for the retail of electricity to business customers in South West Interconnected System (SWIS), Western Australia. The licence was issued on 18th of August 2015 and was amended to allow the licensee to supply electricity to small-use business customers on 4th May 2018.

CleanTech is also a registered Market Generator with AEMO (referred to as CTE) from 26th June 2015 in Western Australia for the BIOGAS01 facility.

There have been no complaints made against CleanTech and there have been no serious breaches in our regulatory requirements.

The date and location of previous operations

CleanTech WA have been retailing electricity to large-use customers on the SWIS grid since 18th of August 2015.

CleanTech WA have been retailing electricity to small-use business customers on the SWIS grid since 4th May 2018.

CleanTech WA have been selling wholesale electricity to the market on the SWIS grid since 26th June 2015.

1.2. The form of energy sold

Electricity

1.3. The scale of operations (including the number and size of customers)

CleanTech's customers are predominately large-use customers within the retail, commercial and industrial sectors. Details of customer numbers are included in Appendix E.

1.4 A description of how the retail activities were conducted

CleanTech WA services all Contestable business energy users within the SWIS through individually tailored electricity solutions, primarily including:

- the purchase of electricity generated by customers which own and operate small scale power plants, to then be sold onto the Wholesale Electricity Market ("WEM");
- the export of electricity from the WEM as required by customers; and
- assistance with managing the electricity consumption profiles of customers to align with the supply and demand factors affecting the WEM.

CleanTech Energy WA use a combination of methods to generate leads, particularly cold-calling, networking and through paid and non-paid consultants.

2. Details of any other relevant retail or energy market experience

CleanTech Energy completed the first external audit in 2017 and as a result of the audit the ERA granted and extended 1-year audit period until 2020.

CleanTech Energy have not received any complaints from our customers or any other relevant body.

The members of CleanTech Energy's management team combine:

- (a) complementary experience in other utility retail industries including the engineering, economics, business law, energy and finance sectors;
- (b) extensive experience in wholesale electricity trading and risk management;
- (c) strong backgrounds in businesses focused on customer service; and
- (d) entrepreneurial and IT expertise.

CleanTech team members also have experience working within strict compliance frameworks in the electricity, mining, marine safety, finance, accounting and banking industries, giving CleanTech Energy the skills and experience required to operate an electricity retail business in the Jurisdictions in compliance with the applicable laws, regulations, codes and guidelines.

3. Where you do not have previous energy market experience, how you intend to bring this experience into your business

CleanTech Energy considers its experience with energy market in WA valuable and transferable onto the NEM market. However, we also intend to hire an experienced Sales Manager who will be based in South Australia to work in conjunction with CleanTech's General Manager and board of Directors.

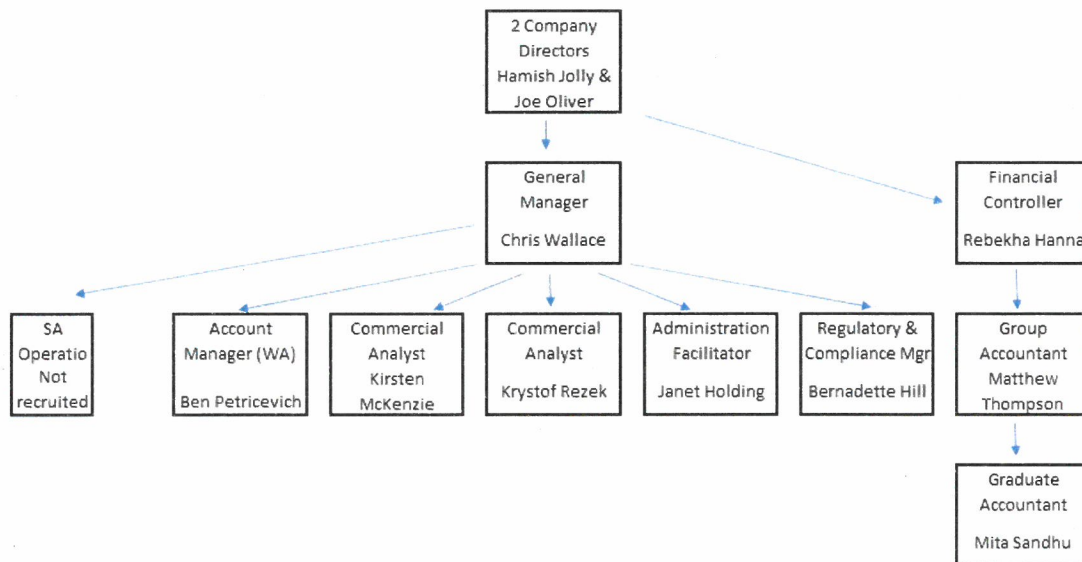
To complement and support our growth into the NEM, we believe “on the ground” support in South Australia is imperative to assist our business. The successful candidate will be required to have extensive knowledge and practical experience in roles in the National Energy Market (NEM) which will assist CleanTech Energy’s transition into the East Coast Market. The practical experience must include and thoroughly understand NEM compliance and will provide a locally based face to face contact point for our customers and for our stakeholders.

The Regulatory and Compliance Manager will also ensure that compliance training is provided to the team to ensure that all regulatory obligations are understood and can be met.

CleanTech staff were chosen for their individual expertise and between the team there is a wide range of knowledge and experience. As we grow our customer base our intention is for all CleanTech Energy team to be able to be across all areas of the business. This then ensures that the team is equally driven which ultimately passes through to benefit our customers by compliance with the national energy customer framework obligations and the industry by providing competitive retail solutions.

Further information is included in Appendix B.

4. An organisation chart showing the structure of your organisation.



5. The number of employees, broken down by business unit or other relevant classification

Business Unit	
2	Directors
1	General Manager
1	SA Operations Manager (to be filled)
1	Sales
2	Operations
1	Administration
1	Compliance
3	Accountants

6. A summary of qualifications, technical skills and experience of your officers, and the relevance of those skills and experience to meeting the requirements of the retailer authorisation

Hamish Jolly, Director – Strategy and Governance

Hamish is responsible for the future direction, risk mitigation, and opportunity maximisation of CleanTech Energy. He brings decades of local experience in various sectors to the company. A Chartered Accountant (ACA), Hamish's career is in executive management (to CEO level) around commercial strategy, innovation and commercialisation, investment analysis, project management, banking, IT and environment.

Hamish has 20 years of professional services includes his role as a Consulting Director of global firm where he was part of the leadership team. Formerly Director of Strategy and Ventures at one of Australia's largest banks. Hamish has undertaken major investment assignments in Australia and overseas, including cross border investment negotiation, policy and finance for large infrastructure projects, which includes a large oil and gas project.

Responsible for management of a broad range of business entities including technology, manufacturing, retail and building. Professional consulting to industry in corporate management and financial analysis. Conducted receiverships, liquidations, bankruptcies, trade-outs, creditors arrangements and other insolvent administrations.

Hamish has an extensive financial analysis and risk mitigation background spanning most of his career. As a result of this we believe that CleanTech Energy will be in a very strong position to ensure we deliver and understand all our obligations around risk strategies and financial risks/implications.

Joseph (Joe) Oliver, Director – Technical and Engineering

Joe is responsible for liaising with and developing new renewable electricity generation facilities. Holding a Higher National Certificate in Electrical and Electronic Engineering, Joe was recruited from the United Kingdom due to his previous experience in project managing the construction of renewable energy power plants across Europe.

Joe acted as General Manager of Biogas Renewable Pty Ltd during the construction and commissioning of their flagship power plant and continues to manage the growth of new

opportunities for this company. His previous roles included Electrical Engineer and Project Manager at Edina UK, Farmgen Ltd, and Monsal under GE Power.

Previous experience has also involved team and project management, Business Development and Sales. Managing cash flow, optimising company efficiency and company marketing.

Joe has extensive experience in project management, business development, sales, managing cash flow, optimisation of company efficiencies' which will assist in managing company risks assisting in the safe growth of CleanTech Energy.

Chris Wallace, General Manager

Chris has worked in the energy industry for over 13 years and worked for two large electricity / gas retailers who hold licenses to supply to residential, small and large-use customers since early 2006. Chris has a Graduate Diploma Business Administration and Master of Business Administration and Management at Griffin University.

Chris worked for just over 5 years for AGL on the East Coast in both South Australia and Melbourne and over 5 years for Alinta Energy both in West and East Coast markets. Having worked for both AGL and Alinta Energy this has given Chris a great understanding of NEM and WEM market rules and regulations.

Chris has also worked as a Business Development Manager for Energy Solutions at ATCO, Director of CAW Energy Services and Manager of APAC Markets Ecocentric Energy all these roles were based in the West Coast. Chris also had the opportunity to work in the wholesale market for 2 years whilst working at Alinta Energy.

CleanTech Energy feel that the wealth of knowledge on both the East and West Coast markets that Chris brings will be of great benefit and will strengthen the business knowledge assisting CleanTech Energy going into the NEM market.

Krystof Rezek, Commercial Analyst

Krystof is responsible for the administration of market operation requirements and price and forecasting analysis.

Krystof has a Bachelor of Business, majoring in Economics and Finance and has been working for CleanTech Energy for 3.5 years. As Commercial Analyst, Krystof is responsible for forecasting, commercial and financial analysis, and risk assessment.

Krystof has worked with AEMO, Western Power, Clean Energy Regulator in his time at CleanTech Energy. He has also improved business efficiency at CleanTech Energy by streamlining invoicing, customer quote process and understands financial forecasting and modelling in the energy sector.

Kirsten McKenzie, Commercial Analyst

Kirsten will be commencing on 12 August 2019 and has a Master of Engineering degree (Environmental) and Bachelor of Science.

Kirsten brings the following experience. The management and analytics of a demand management program for New Zealand's Regional Coincident Peak Demand (RCPD) charges; Financial forecasting and settlement for performance-based programs. Overseeing the analytics and prototyping of tools in the development of new program offerings relating to site peak demand management and advisory solutions, analysing electricity meter data of portfolio of sites; assisting in managing a portfolio of customers; ensuring compliance with market rules; improving processes and systems to make them more efficient and less error-prone; the design, development and testing of tools and forecast models in Excel, R & Tableau and has worked in both the WEM and NEM energy markets..

Ben Petricevich, Business Account Manager.

Ben has over 10 years' experience in sales roles where he has managed large portfolios of customers which ranged from commercial to government sectors.

Ben has an aviation degree and has a very technical mind and has a strong background in client, account management, retention, customer service and sales and had over 10 years working in aviation, real estate and the hire industry. Ben is fully aware on ensuring that positive results and customer satisfaction are imperative and is accustomed to going above and beyond to exceed client's/customers' expectations.

Janet Holding, Administration Facilitator

Janet has 10 years' experience working for a WA electricity and gas retailer dealing with customer transfers and all matters involving the network operator, as well as credit control, administration and team management. Janet's previous experience also includes managing the Western Power portal, churn requests, tariff updates/changes, meter history requests, manages customer site details, accounts receivable, contract administration, billing and all these skills will assist CleanTech Energy going into the NEM market. Janet will ensure that CleanTech will be compliant with retailer obligations under the National Energy Customer guidelines.

Bernadette (Bee) Hill, Regulatory & Compliance Manager

Bernadette has 19 years' experience working in the energy market for a large retailer in WA and two of those years were managing national compliance/performance reporting. Bernadette has had the opportunity to work across many areas of the business which included both residential and business customers, which included the following: billing, credit, payments, complaints, managing hardship/ombudsman teams nationally, worked with financial counsellors, regulatory/compliance reporting, which included reporting Type 1 breaches and ensuring all the Quarterly, Bi-annual and Annual reports were submitted on time.

Bernadette's skills and experience will assist CleanTech Energy to comply with its retailer obligations to customers (small and large) under the National Energy Customer Framework, ensuring all reporting will be submitted in a timely manner to the AER".

Bernadette has also managed door to door complaints in the east coast market, coached and developed team members and ensured all staff in the business were across their compliance obligations by completing annual Salt compliance training, which had an extensive library covering all areas of the business, dependant on the specific role they were doing.

Rebekha Hanna – Financial Controller

Rebekha only recently joined CleanTech Energy and is CPA qualified and has previously worked for an engineering, construction and maintenance services company and part of CIMIC Group – one of the world's largest contractors.

Prior to that Rebekha held Finance Manager/Financial Controller roles for two groups of companies of similar size and growth as our own – one in multi-services and the other in subsea technologies. This is supported by a Tax Accountant role with national firm.

Rebekha is also completing a Master of Applied Finance majoring in Corporate Finance and Financial Analysis

Matthew Thompson – Group Accountant

Matthew, a Chartered Accountant, studied a Commerce Degree in Accounting and Small Business. He came onboard with CleanTech Energy in 2018 due to the growth in WA.

Previously, Matthew worked as a group accountant large WA company as their Group Accountant while studying a graduate diploma in Governance. Previously, he spent seven years with a Chartered Accountants in a senior business services role

Matthew brings strong financial oversight and analytical skills to inform stakeholders of key trends and financial performance which will assist in the NEM market.

Aasmita (Mita) Sandhu - Junior Accountant

Mita has a degree in Accounting and Business Law and recently joined CleanTech Energy after excelling at an internship with us.

Mita manages account receivables and payables, records and keeps track of transactions, admin, website updates, booking travel arrangements, assists group accountant with monthly preparation of end of month reporting, reconciliations and Mita also assists in all other areas of the CleanTech Energy business.

7. Outsourcing and third-party reliance requirements

Given the small number of customers envisaged there is limited outsourcing of retail related systems, capabilities and functions. Frontline support for the majority of IT systems is managed and maintained internally, with an external IT expert company to assist when required for general office matters (e.g., setting up new email address).

All aspects relating to customer invoicing and information transfer, and IT systems relating to compliance, risk and settlement systems is managed inhouse.

More information is included in Appendix B and Appendix C.

8. A business plan, including but not limited to, strategic direction and objectives, forecast results and detailed assumptions on how you calculated these forecasts.

See: Appendix B – Business Plan
Appendix D – 5-year financial forecast

CleanTech Energy has identified an opportunity to grow on its retail presence by expanding to the eastern states to operate in the NEM.

In its commercial-in-confidence Business Plan (refer Appendix B), CleanTech Energy's objective is one of slow growth in line with growth in, or contracts to purchase, renewable energy generation, and to match customer demand as closely as possible to our renewable energy portfolio.

CleanTech's derivative trading activities will include a range of customised hedging products tailored to wholesale customer risk preferences. This is aimed at developing tailored price risk products for business customers. CleanTech Energy's short-term planning is to set an objective of a relatively small number of business customers who have their own source of renewable energy generation.

As CleanTech already has in place many of the requirements for retail supply by virtue of its own renewable energy generation (contracts and/or assets), expansion of this retail activity to include a small portfolio of specifically selected customers based on their load profile, is considered to be a low incremental-cost exercise and this should reflect in the pricing that CleanTech is able to offer.

CleanTech is capable of tailoring products to suit individual risk preferences and can provide a full spectrum of risk management products from pass-through pricing to standard fixed-price fixed-term whole of meter contracts for electricity and gas, as well as managing any environmental market risks.

CleanTech has prepared a commercial-in-confidence five-year financial forecast (Confidential Appendix D) as part of this application which demonstrates that returns relating to activities undertaken under a retail authority make commercial sense. It also provides evidence that CleanTech is financially viable to provide the proposed electricity retail services and has sufficient financial resources to sustain its operations.

9. Details of your compliance strategy

As a licensed electricity retailer on the SWIS grid, CleanTech Energy is very aware of and understands the obligations it has under the Electricity Retail Act in relation to retailing electricity.

The General Manager is the nominated member responsible for the development of appropriate operational procedures, policies and other measures to ensure that CleanTech Energy always complies with their obligations.

The Regulatory and Compliance Manager will prepare and submit once approved by the General Manager, all of the compliance reports to the relevant governing body as required and is responsible for training and educating of all staff to ensure full compliance with all relevant obligations on an ongoing basis.

CleanTech Energy is committed to maintaining a culture of compliance to all laws, policies, procedures,

regulatory frameworks and organisational requirements applicable to its role as an energy retailer, this includes finance, reporting, employment, right to information and competition.

The purpose of this Policy is to:

- outline CleanTech Energy's key categories of compliance obligations;
- set out CleanTech Energy's compliance management objectives in all its operations, maintaining a culture of compliance and to clearly promote a positive compliance culture with all employees in relation to meeting its compliance objectives and risks; and
- document a clear plan to identify and monitor all compliance obligations, including those imposed on authorised retailers under the National Energy Retail Law and National Energy Retail Rules.

This policy aligns with the principles and requirements set out in ISO 19600:2015 Compliance Management System Guidelines and has been endorsed by the CleanTech Energy's Directors and General Manager.

The Compliance and Risk Management Committee is focused on regulatory compliance and business risk. The committee will meet regularly to review current regulatory compliance, reporting obligations applicable to our retail energy business and will have them recorded in a compliance obligations register.

The chart below shows a high-level outline of CleanTech Energy's compliance management process:



See: Annexure 3

Non-Compliance:

All non-compliance needs to be appropriately reported. While the reporting of systemic and recurring problems is particularly important, a one-off non-compliance can be of equal concern if it is major or deliberate. Even a small failure may indicate serious weakness in the current process and the compliance management system. If not reported in a timely manner it can lead to the view that the failure does not matter and can result in such failure becoming a systemic problem.

Any non-compliance matters that are high risk will be escalated by the Regulatory & Compliance

Manager to the General Manager/CRMC for discussion with the Directors through CleanTech Energy's non-compliance reporting process.

See Appendix I - Compliance Policy has been developed to ensure that CleanTech Energy is compliant with all its legal obligations as an authorised retailer. The law firm HFW has reviewed this document and provided written assurance that it is appropriate for its intended purpose.

The chart below shows a high-level outline of CleanTech Energy's compliance management process:

Complaints and dispute resolution

A copy of our Complaints and Dispute Resolution Policy is included in Appendix F.

10. A copy of your risk management strategy covering both operational and financial risk

The chart below shows our High-level outline of CleanTech Energy's Risk Management framework:



The document outlines our Risk Management Framework and methodology for Risk Management across the business. By promoting a strong risk management culture, we are committing to ensure that risk management practices are embedded into all operational, financial and other aspects of the business to drive consistent, effective and accountable practices and decision making for all CleanTech Energy employees and our commercial partners.

The document sets out details of the organisational procedures for designing, implementing, monitoring, reviewing and continually improving risk management throughout the business. This is supported by our Risk Management Register which will be used to identify, record, and categorise risks. Any potential risks will then be evaluated against a rating criterion to be assessed, and measures will be put in place to deal with the risk accordingly.

CleanTech Energy is committed to the effective management of its strategic, operational, and financial risks to achieve the organisations vision, purpose and strategic objectives. CleanTech Energy will:

- Maintain a relevant risk management framework that articulates standards and responsibilities across all levels and all functions of the business, including processes for risk identification, monitoring, treatment, and reporting;
- Manage risks in a manner that is commensurate with expectations of customers and all legal regulatory and legislative obligations;
- Have robust audit, compliance and general governance functions;
- Monitor and manage financial risk closely, including customer payment;
- Promote consistency and transparency in methodology, assessment, and management process;
- Have clear processes in place for reporting on risk status, and changes to risk status;
- Set clear expectations and monitor how often risks will be reviewed, the process for review and who will be involved;
- Provide appropriate, consistent and transparent ownership and accountability for risk mitigation, with leadership coming from Board level;
- Promote proactive recognition of external factors and anticipation of uncertainties that may affect the achievement of strategic objectives;
- Provide mechanisms for the timely identification and effective management of risk occurrences and consequences;
- Be resourced appropriately to effectively mitigate risk (including through the appointment of additional staff commensurate with the gradual growth of the retail operations);
- Recognise that timely and accurate monitoring, review, communication is critical for:
 - providing mechanisms for the timely identification and effective management of risk occurrences and consequences;
 - providing confidence in management practice to the directors;
 - providing a solid platform for growth;
- Undertake regular reporting of the corporate risk to the risk management committee

See Appendix G – Risk Management Strategy has been developed to ensure that CleanTech Energy is compliant with all its legal obligations as an authorised retailer. The law firm HFW has reviewed this document and provided written assurance that it is appropriate for its intended purpose.

See Annexure 4 – Risk Register

11. Evidence that your risk management and compliance strategies have been subject to an external assurance process

See Appendix W – Letter external auditors

12. Any additional information which demonstrates your ability to manage risk and operate in accordance with Retail Law objective, particularly the long-term interests of consumers

See Appendix G – Risk Management Strategy

13. Evidence of any membership, or steps taken to obtain membership of a recognised energy industry ombudsman scheme in the jurisdiction in which you intend to retail energy to small customers

CleanTech is a member of the Ombudsman scheme in WA and have contacted the Energy and Water Ombudsman of South Australia and initiated the application process.

See Appendix T

14. Evidence of any agreements / arrangements in place with key market players within the jurisdictions in which you intend to operate. This includes, but is not limited to, distribution businesses and AEMO. Where agreements / arrangements have not been finalised, you should provide details of any negotiations or steps that have occurred to date and when you expect agreements / arrangements to be completed.

CleanTech contacted Power Networks regarding access to the distribution network in South Australia. Power Networks advised that once CleanTech receives a Participant ID, they will be able to initiate the participant registration process on their part.

CleanTech Energy contacted AEMO regarding our application to become a market participant in NEM and have confirmed their requirements going forward.

Financial Capacity Criterion

1. Copies of your audited financial reports for the past 12 months. This information should include:

1.1. All financial statements required by the accounting standards

See Appendix Q

1.2. Notes to financial statements

2. Evidence of long and / or short-term credit rating (if available).

See Appendix U

3. Start-up businesses

CleanTech is not a start-up business.

4. If you are part of a group of related companies, and / or party to a partnership, joint venture or alliance agreement with another company, and you are given financial support by that entity, you should provide:

CleanTech Energy is not part of a group or joint venture in any way.

5. A written declaration from your Chief Financial Officer, Chief Executive Officer or director/s stating you are a going concern and that the officer is unaware of any factor that would impede your ability to finance your energy retailer activities under the retailer authorisation for the next 12 months. For unincorporated applicants, a written declaration should be provided by the person/s in effective control of the business.

Written declaration from Financial Controller stating that CleanTech Energy is a going concern and unaware of any factor that would impede ability to finance CleanTech Energy Retailer activities.

See Appendix J

6. A written declaration from an independent auditor or your principal financial institution.

See Appendix M

7. Details of any bank guarantees or arrangements or process to access additional capital

See Appendix V.

8. Forecast revenue and expenses to the point where your business is cash-flow positive. This forecast should be consistent with your business plan and highlight all key assumptions and risks.

See Appendix D

Suitability Criterion

1. For you and your associates, any other business where your officers have held an officer position and any other entity that exerts control over your business activities—details of:

1.1. *Any material failure to comply with regulatory requirements, laws or other obligations over the previous 10 years, including infringement notices or other enforcement action (including voluntary administrative undertakings) being taken by a regulatory body. – None*

1.2. *Any previously revoked authorisations, authorities or licences held in any industry and the reason/s for the revocation. – Revoked licence application October 2019 due to a change in CleanTech Energy's General Manager during the application process*

1.3. *Any failed authorisation, authority or licence applications in any industry and the reason/s the application was unsuccessful. – None*

1.4. *Any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry. – None*

1.5. *Any situation/s where you (or an associate) have previously triggered the RoLR provisions of the Retail Law or equivalent state/territory/foreign legislation or have transferred or surrendered an authorisation or licence in circumstances where if not done, triggering a RoLR event would have been likely. – None*

See Appendix X and Appendix Y

CleanTech Energy or any of its directors or officers have never been part of a business which had to deal with any of the situations detailed above.

2 Details of any offences or successful prosecutions under any territory, state, Commonwealth or foreign legislation (including, but not limited to, the Australian Securities and Investments Commission Act 2001 (Cth), Competition and Consumer Act 2010 (Cth) and the Corporations Act 2001 (Cth)) relevant to your capacity as an energy retailer, or written confirmation that no offences have been committed against, or been prosecuted under, any such legislation. This information must be provided for:

- Your current director/s (or shadow / de facto director/s), and any other person that exerts control over your business activities
None of the directors of CleanTech Energy were ever prosecuted by any of the institutions listed.

- If your business is unincorporated, the person/s with effective control of the business all persons who are responsible for significant operating decisions for your business.

4. Written declarations from your Chief Executive Officer:

See Appendix Y

5. Full names and current residential addresses of all your officers.

Attached as Appendix C – Staff Information

6. Details of policies and procedures addressing the probity and competence of officers and any other key management staff.

See: Appendix C Staff Information
Appendix F Complaints and Disputes Resolution Policy
Appendix H Privacy and Credit Reporting Policy
Appendix I Compliance Policy

List of Submission Documents

Application Documents

1. CleanTech Energy Pty Ltd Retail Licence Application – Electricity - **Confidential**
2. CleanTech Energy Pty Ltd Retail Licence Application – Electricity - **Public**

List of Appendixes

Appendix A	Certificate of Business Registration - Confidential
Appendix B	Business Plan – Confidential
Appendix C	Staff Information - Confidential
Appendix D	Financial Forecast – Confidential
Appendix E	CleanTech WA Customer Numbers - Confidential
Appendix F	Complaints and Disputes Resolution Policy
Appendix G	Risk Management Plan - Confidential
Appendix H	Privacy and Credit Reporting Policy
Appendix I	Compliance Policy – Confidential
Appendix J	Written Declaration Going Concern – FC - Confidential
Appendix K(i)	Bendigo Bank – Debtor Facility - Confidential
Appendix K(i)	Bendigo Bank- Trust Account Statement – Confidential
Appendix K(ii)	WBC Cash Reserve - statement - Confidential
Appendix K(i)	WBC Transaction - statement - Confidential
Appendix M	Financial Institution Declaration – Confidential
Appendix N	CleanTech Energy Standard Electricity Contract
Appendix P	CleanTech Energy Customer Schedule – Electricity – Confidential
Appendix Q	Financial Statements ending 2018- 2019 - Confidential
Appendix R	Disconnection Policy
Appendix S	Hardship Policy
Appendix T	Energy Ombudsman Communication – Confidential
Appendix U	Credit Rating - Confidential
Appendix V	Details of bank guarantees – Confidential
Appendix W	External audit letter – Confidential
Appendix X	Suitability Criterion – Statutory Declarations – Confidential

Appendix Y Written Declaration by FC - Suitability Criterion – **Confidential**

List of Spreadsheets

Appendix D Financial Forecast – **Confidential**

List of Annexure

Annexure 1 to CMP – Key NEM retailer obligations under NECF - **Confidential**

Annexure 2 Issues register - **Confidential**

Annexure 3 Obligations register - **Confidential**

Annexure 4 Risk register - **Confidential**